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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Local Competition and) CC Docket No. 99-301
Broadband Reporting)

Reply Comments of ALLTEL Communications, Inc.

ALLTEL Communications, Inc. ("ACI")¹ submits its Reply Comments in the above-referenced matter regarding the Commission's proposed reporting requirements.² ACI notes, as did many of those filing comments, that while the Commission's need for the information sought may be justified, the proposed reporting requirements should be tempered to address carriers' legitimate concerns over the administrative burdens the new requirements pose and confidentiality issues. Much of the information sought by the Commission may, in fact, be available from other sources.³ Any reporting requirement adopted by the Commission should be flexible and must be circumscribed by the Commission's need for the information⁴ as opposed to frequently providing useful data

¹ ACI is the wholly owned, separated subsidiary of ALLTEL Corporation through which competitive telecommunications services, including CLEC and CMRS services, are provided to the public. ACI is affiliated, by virtue of common ownership by ALLTEL Corporation, with various incumbent local exchange companies.

² ACI seeks leave to file its Reply Comments in order to promote the compilation of a full record in this matter.

³ See, for example, Comments of Omnipoint Communications, Inc. (suggesting that carriers already provide competitive data in their COCUS filings) and Comments of MediaOne Group, Inc. (suggesting that numerous states already have similar reporting requirements.)

⁴ See generally, Comments of the Competitive Telecommunications Association ("Comptel") at pages 2-5.

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upon which other carriers might rely for purposes of forbearance petitions or other filings.⁵

The most important steps which the Commission may take to reduce the reporting burden on carriers are to: 1) not require carriers to report data they do not otherwise collect in the ordinary course of their business; and 2) limit the reporting requirements to only those classes of services and providers that are situated to impact broadband deployment and competition in the local exchange market. In this connection, ACI shares the concerns expressed by Comptel⁶ as well as those CMRS carriers arguing that CMRS services should be exempted from the reporting requirements.⁷ Further, ACI fully supports the suggestion that only separately organized carriers with 50,000 access lines in a state or study area should report on a state by state basis.⁸

Virtually all carriers submitting comments voiced concern over the confidentiality of the data and the manner in which information would be made public. ACI shares those concerns and is particularly concerned that the information sought by the Commission is particularly sensitive in the CMRS and CLEC markets. The concern is

⁵ In this connection, see Comments of US West Communications at page 2. ACI notes that the vast majority of carriers favor annual reporting and therefore opposes proposals to lower the reporting threshold to 10,000 access lines and for quarterly reporting. Comments of US West Communications, Inc. at page 3; Comments of BellSouth Corporation at pages 2-4.

⁶ See Comments of the Comptel at pages 2-4.


⁷ See generally, Comments of Omnipoint Communications, Inc. at page 8; Comments of Bell Atlantic Mobile, Inc. at pages 1-4; Comments of GTE Service Corporation at page 5. ACI notes the huge reporting burden the Commission's proposal places on CMRS carriers by virtue of the fact that many licensees are separate legal entities composed of diverse ownership beyond a single carrier. It would be unduly burdensome to require each such entity to report to the Commission. In this connection, see Comments of BellSouth Corporation at pages 5-6.

⁸ See, Comments of the National Rural Telecom Association at page 7; Comments of Frontier Corporation at page 4. ACI finds the three suggestions proffered by Frontier Corporation to be a particularly sensible approach to minimizing the burden on smaller carriers.

heightened to the extent the Commission considers a more granular reporting inasmuch as the competitive import of the information increases geometrically as the reporting area is reduced. Consequently, ACI believes that reporting should be no more granular than on a state-by-state basis and proposals for smaller reporting areas should be rejected.⁹

Respectfully submitted.

ALLTEL Communications, Inc.

By: 
Glenn S. Rabin
Assistant Vice President
Federal Regulatory Affairs

ALLTEL Corporation
601 Pennsylvania Avenue, N.W.
Suite 720
Washington, D.C. 20004
(202) 783-3976

Dated: December 20, 1999

⁹ In this connection, ACI argues against the smaller reporting areas suggested in the Comments of the Office of the Attorney General, State of Tennessee, Consumer Advocate Division at pages 3-6.

CERTIFICATE OF SERVICE

I, Payquith B. White, hereby certify that on this 20th day of December 1999, caused a copy of the attached Reply Comments of ALLTEL Communications, Inc. to be served by first class mail postage paid, to the following:

*Ms. Terry Conway, Paralegal Specialist
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Room 6-A100
Washington, DC 20554

*Mr. Andrew Wise, Industry Economist
Federal Communications Commission
445 12th Street, SW
Room 3-A824
Washington, DC 20554

*Mr. Jerome Stanshine, Economist
Office of Engineering & Technology
Federal Communications Commission
445 12th Street, SW
Room 7-B458
Washington, DC 20554

*Mr. Walter Strack, Bureau Chief Economist
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Jeanne W. Stockman
Swindler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007
Counsel for Winstar Communications, Inc.

Lolita Smith
CTIA
1250 Connecticut Ave. NW
Suite 800
Washington, DC 20036

John T. Scott, III
Crowell & Moring, LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Communications, Inc.
2001 Edmund Halley Drive
Reston, VA 20191

Thomas R. Parker
GTE Service Corporation
600 Hidden Ridge, HQE03J43
Irvington, TX 75015-2092

Gail L. Polivy
GTE Service Corporation
1850 M Street, NW
Suite 1200
Washington, DC 20036

Keith Townsend
1401 H Street NW
Suite 600
Washington, DC 20005

Leon Kestenbaum
Jay C. Keithley
Norina T. Moy
1850 M Street, NW
Suite 1110
Washington, DC 20036

Stuart Polikoff
Stephen Pastorkovich
21 Dupont Circle NW
Suite 700
Washington, DC 20036

Robert W. McCausland
Robert E. Kelly
Allegiance Telecom, Inc.
1100 15th Street NW
Suite 200
Washington, DC 20005

Margot Smiley Humphrey
Kotten & Naftalin, LLP
1150 Connecticut Avenue, NW
Suite 1000
Washington, DC

Susan M. Eid
Tina S. Pyle
Richard A. Karre
MediaOne Group, Inc.
1919 Pennsylvania Ave., NW
Suite 610
Washington, DC 20006

Gunnar D. Halley
Willkie Farr & Gallagher
1155 21st Street, NW
Washington, DC 20036

Jonathan Askin
Emily M. Williams
888 17th Street NW
Washington, DC

Vincent C. DeGarlais
1020 19th Street, NW
Suite 700
Washington, DC 20036

SBC Communications, Inc.
Alfred G. Ritcher, Jr.
Roger K. Toppins
Mark P. Royer
One Bell Plaza
Room 3024
Dallas, Texas 75202

Lisa Chandler Cordell
Bienstock & Clark
5360 Holiday Terrace
Kalamazoo, Michigan 49009

Arthur H. Stuenkel
1000 Center Street
P.O. Box 400
Little Rock, AR 72203-0400

Ken Pfister
TELEC Consulting Resource, Inc.
909 N. 96th Street
Suite 3
Omaha, NE 68114-2508

Susan J. Bahr
Law Offices of Susan Bahr, PC
P.O. Box 86089
Montgomery Village, MD 20886

Michael J. Shortley, III
Frontier Corporation
180 South Clinton Avenue
Rochester, New York 14646

Stephen L. Earnest
BELLSOUTH CORPORATION
1155 Peachtree Street, NE
Suite 1700
Atlanta, Georgia 30306-3610

Carol Ann Bischoff
1900 M Street, NW
Suite 800
Washington, DC 20036

Benjamin H. Dickens, Jr.
Blooston, Mordofsky, Jackson, & Dickens
2120 L Street, NW
Washington, DC 20037


George N. Barclay
Michael J. Ettner
General Services Administration
1800 F Street, NW
Room 4002
Washington, DC 20405

Daniel L. Brenner
Neal M. Goldberg
David Nicoll
1724 Massachusetts Avenue
Washington, DC 20036-3664

L Vincent Williams
Deputy Attorney General
Office of the Attorney General
State of Tennessee
425 5th Avenue North
Nashville, TN 37243

Michael Olsen
Norhtpoint Communications, Inc.
222 Sutter Street, 7th Floor
San Francisco, CA 94108

Ruthman Milkman
Lawler Metzger & Milkman, LLC
1909 K Street, NW
Suite 820
Washington, DC 20006


Payquith B. White

* Hand Delivered